

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

PANDORA JEWELRY, LLC,

Movant,

v.

BLUE TIME, INC. and SOLAR TIME, INC.,

Respondents.

Case No. 1:22-mc-00238

*Related to Civil Action No.  
1:21-cv-02973-SAG (D. Md.)*

**NOTICE OF MOTION TO COMPEL  
COMPLIANCE WITH  
SUBPOENAS TO BLUE TIME, INC.  
AND SOLAR TIME, INC.**

**Oral Argument Requested**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law and the Declaration of Martha Brewer Motley dated August 25, 2022, and all the exhibits thereto, Movant Pandora Jewelry, LLC, by and through its undersigned counsel, will move this Court on a date and time to be determined by the Court for entry of an Order Compelling Compliance with Subpoenas to third parties Blue Time, Inc. and Solar Time, Inc. pursuant to Fed. R. Civ. P. 45, in connection with the action pending in the United States District Court for the District of Maryland captioned *Pandora Jewelry, LLC v. John Doe 1-10*, No. 1:21-cv-02973-SAG.

Movant hereby certifies that Movant's counsel in the underlying action in the District of Maryland has met and conferred in good faith with counsel for the above-named Respondents via telephone and e-mail to secure compliance with the Subpoenas without requiring judicial intervention, as set forth in the accompanying Declaration of Martha Brewer Motley, but such efforts have not been successful.

Date: New York, New York  
August 25, 2022

Respectfully submitted,

**MINTZ & GOLD LLP**

*/s/ Terence W. McCormick*

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*Pro Hac Vice applications forthcoming*